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U S NAVY RESPONSE TO REGULATOR COMMENTS TO DRAFT RECORD OF DECISION  
AREA OF CONCERN 55C WETLAND AREA NORTH OF TROTTER ROAD WITH  
TRANSMITTAL NAS SOUTH WEYMOUTH MA  
7/11/2011  
TETRA TECH



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C-NAVY-07-11-4474W

July 11, 2011

Project Number G02073

Mr. Brian Helland, RPM  
BRAC PMO, Northeast  
4911 South Broad Street  
Philadelphia, Pennsylvania 19112

Reference: CLEAN Contract No. N62470-08-D-1001  
Contract Task Order (CTO) No. WE11

Subject: Responses to Comments, Draft Record of Decision  
Draft Final Record of Decision  
Area of Concern 55C, Wetland Area North of Trotter Road  
Former Naval Air Station South Weymouth, Weymouth, Massachusetts

Dear Mr. Helland:

Enclosed are responses to comments (RTCs) received from the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MassDEP) on the draft Record of Decision (ROD) for Area of Concern 55C, Wetland Area North of Trotter Road, at the former Naval Air Station (NAS) South Weymouth in Weymouth, Massachusetts. The ROD has been revised to incorporate the responses to the EPA and MassDEP comments. The draft final ROD is also enclosed.

On behalf of the Navy, RTCs and the draft final ROD for Area of Concern 55C are being provided to the EPA and MassDEP. If you have any questions regarding the document, please contact me at (978) 474-8403.

Very truly yours,

Phoebe A. Call  
Project Manager

PAC/lh

Enclosures

c: D. Barney, Navy (w/encl. - 1)  
K. Keckler, EPA (w/encl. - 3)  
D. Chaffin, MassDEP (w/encl. - 1)  
D. Straker, TtNUS (w/encl. - 1)  
J. Trepanowski, TtNUS (w/o encl)  
G. Glenn, TtNUS (w/o encl.)  
File G02073-3.2 (w/o encl.); G02073-8.0 (w/encl. - 1)

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**NAVY RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)  
COMMENTS (DATED JUNE 22, 2011)  
DRAFT RECORD OF DECISION  
AREA OF CONCERN (AOC) 55C, WETLAND AREA NORTH OF TROTTER ROAD  
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

Navy responses to the EPA comments on the Draft Proposed Plan for AOC 55C, Wetland Area North of Trotter Road, are presented below. EPA's comments have been compiled from electronic mark-ups of the document and are presented first (in italics) followed by Navy's responses.

**Comment 1. Table 2-1:** *This table also describes some of the cleanup actions taken. Please amend the title to reflect this.*

**Response:** The title of Table 2-1 has been changed to: "AOC 55C Investigations and Removal Actions."

**Comment 2. Table 2-1, NTCRA activities:** *Delete the phrase "for at least 2 years" from the last sentence.*

**Response:** The sentence will be revised as follows: "Post-restoration monitoring will be performed to ensure the success..."

**Comment 3. Page 6, §2.3, ¶3, first sentence:** *Delete the phrase "a mailing list of."*

**Response:** The change has been made as suggested.

**Comment 4. Page 6, §2.4, first sentence:** *Delete the phrase "Department of the."*

**Response:** The sentence has been revised as suggested.

**Comment 5. Page 6, §2.4, second sentence:** *Delete the phrase "reviews and provides."*

**Response:** The sentence has been revised as suggested.

**Comment 6. Page 7, §2.4, ¶1, first sentence:** *Delete the word "being."*

**Response:** The change has been made as suggested.

**Comment 7. Page 7, §2.4, ¶1, third sentence:** *Delete the phrase "due to the potential for contamination."*

**Response:** The change has been made as suggested.

**Comment 8. Page 7, §2.4, ¶1, fourth sentence:** *Delete the phrase "one or more."*

**Response:** The change has been made as suggested.

**Comment 9. Page 7, §2.4, ¶1, fifth sentence:** *Delete the word "has."*

**Response:** The change has been made as suggested.

**Comment 10. Page 7, §2.4, ¶1, sixth sentence:** *Delete the word "then."*

**Response:** The change has been made as suggested.

**Comment 11. Page 7, §2.4, ¶2, fifth sentence:** *Delete the phrase "for 2 years."*

**Response:** The change has been made as suggested.

**Comment 12. Page 7, §2.4, ¶2, last sentence:** *Change the phrase “on a regular basis” to “regularly.”*

**Response:** The change has been made as suggested.

**Comment 13. Page 8, §2.5, third sentence:** *Delete the word “likely” and the phrase “via the water table.”*

**Response:** The changes have been made as suggested.

**Comment 14. Page 8, §2.5.1, first sentence:** *Change “1” to “one.”*

**Response:** The change has been made as suggested.

**Comment 15. Page 8, §2.5.1, ¶2, first sentence:** *Change “which” to “that.”*

**Response:** The change has been made as suggested.

**Comment 16. Page 8, §2.5.2, penultimate sentence:** *Delete the word “also.”*

**Response:** The change has been made as suggested.

**Comment 17. Page 8, §2.5.2, last sentence:** *Change the phrase “prior to” to “before.”*

**Response:** The change has been made as suggested.

**Comment 18. Page 9, ¶1, fourth sentence:** *Change the word “indicated” to “indicate.”*

**Response:** The change has been made as suggested.

**Comment 19. Page 9, last ¶:** *Consider adding a table with this data [soil and sediment analytical results] (or referencing it).*

**Response:** A reference “(Tetra Tech, 2009)” where these comparisons to benchmarks can be found has been added to the first sentence in the paragraph.

**Comment 20. Page 10, ¶3, second sentence:** *Change “would be” to “are.”*

**Response:** The change has been made as suggested.

**Comment 21. Page 12, Table 2-3:** *Please make it clear that these were the risks before the removal occurred.*

**Response:** The title of the table has been changed to: “Estimated Potential Human Health Risks, Before Removal Action.”

**Comment 22. Page 14, last sentence:** *Delete the phrase “which was reviewed with the RAB.”*

**Response:** The change has been made as suggested.

**Comment 23. Page 16, §3.1, fifth sentence:** *Change “were” to “are.”*

**Response:** The change has been made as suggested.

**Comment 24. Page 16, Table 3.1, response to second comment:** *Delete first sentence.*

**Response:** The change has been made as suggested.

**Comment 25. Page 16, Table 3.1, response to second comment:** *Add sentence: "This data can be found at (insert proper reference)."*

**Response:** The following sentence has been added: "The groundwater results were presented in *Groundwater Investigation Report for Area of Concern 55C* (Tetra Tech, 2011)."

**Comment 26. Page 16, Table 3.1, response to second comment:** *Insert "," after "east-southeast" and delete "and."*

**Response:** The changes have been made as suggested.

**Comment 27. Page 16, Table 3.1, response to second comment:** *Insert "hydraulically" after "not" and before "connected..."*

**Response:** The change has been made as suggested.

**NAVY RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION  
(MASSDEP) COMMENTS (DATED JUNE 21, 2011)  
RECORD OF DECISION  
AREA OF CONCERN (AOC) 55C, WETLAND AREA NORTH OF TROTTER ROAD  
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

Navy responses to the MassDEP comments on the Draft Record of Decision for AOC 55C, Wetland Area North of Trotter Road, are presented below. MassDEP's comments are presented first (in italics) followed by Navy's responses.

**Comment 1, Section 2.1:** *Text should be revised to indicate that RIA 55 was subdivided into four AOCs. In addition to the three AOCs listed here, AOC 55D was part of RIA 55.*

**Response:** The text has been revised as follows: "...RIA 55 was divided into four separate sites (RIA 55A, RIA 55B, RIA 55C and RIA 55D) that later were reclassified as AOCs."

**Comment 2, Table 2-1, Non-Time-Critical Removal Action (NTCRA):** *The description of the wetland restoration effort could be enhanced by noting that that soil used to backfill the excavation was amended with organic material to more closely match the organic content of the hydric soil in surrounding wetland areas.*

**Response:** The 2<sup>nd</sup> sentence in the NTCRA portion of Table 2-1 has been revised as follows: "The excavated area was backfilled with clean topsoil mixed with organic compost to achieve a minimum organic content of 12 percent, similar to the hydric soil in the surrounding wetland areas."

**Comment 3, Section 2.3:** *The document should be corrected or include a brief explanation for providing public notice of the proposed plan hearing after the hearing (May 11, 13, and 15, 2011 vs. April 25, 2011).*

**Response:** The text was incorrect; the month will be corrected to April rather than May. The public notices were published on April 11, 2011 (Patriot Ledger), April 13, 2011 (Weymouth News) and April 15, 2011 (Rockland Mariner/Standard).

**Comment 4, Section 2.5:** *The meaning of: "...previously located within the site boundaries" is not clear. Is this clause intended to indicate that debris may have been staged within the site boundary and subsequently dispersed or redistributed, that debris was transported from other parts of the base and dumped on-site, or something else?*

**Response:** The word 'previously' has been deleted, as the paragraph refers to pre-removal action conditions.

**Comment 5, Table 2-3:** *To avoid possible confusion, different terms (e.g., "surface soil" and "mixed soil") should be used in the third column to identify and distinguish surface soil risks from mixed surface and subsurface soil risks.*

**Response:** The last two occurrences of the term 'surface soil' in Table 2-3 have been changed to 'mixed soil' in the third column as suggested, and the following note has been added to the table: "Mixed soil indicates a future exposure scenario where surface and subsurface soils have been mixed during development."

**Comment 6, Section 2.7.3:** *The document should identify the human health risk assessment scenario (e.g., residential or commercial) that was used to develop the human health risk-based values for PRG selection.*

**Response:** The following sentence has been added as the penultimate sentence in the first paragraph of Section 2.7.3: "The human health risk-based PRG is the 2009 Regional Screening Level for residential soil and the ecological risk-based PRGs are the geometric mean of the no observable effects concentration and lowest observable effects concentration developed from sediment toxicity testing."

**Comment 7, Section 2.7.3:** *Inclusion of a brief listing of the maximum concentration of each COC reported in the confirmation samples is recommended to characterize post-removal conditions for future reference. A column could be added to Table 2-4 to accomplish this.*

**Response:** A column has been added to Table 2-4 with the maximum post-excavation confirmation result for each COC. Text has been added to the section to explain the results.

**Comment 8, Section 2.7.3:** *The apparent discrepancy between the amount of material removed from the site (1,620 cy) and the amount of material imported to restore the site (1,224 cy) should be explained to avoid the potential concern that the site was inadequately restored.*

**Response:** The sentence, "Approximately 1,224 cubic yards of soil were imported..." will be replaced by the following text: "The excavated areas were backfilled with a topsoil mixture containing approximately 50 to 75 percent topsoil mixed with 25 to 50 percent organic compost to achieve a minimum organic content of 12 percent. The area was then graded to promote a viable wetland habitat."

**Comment 9, Appendix D, Page D-3: Typo:** *"550" should be "55C".*

**Response:** The correction has been made.